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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF NEW YORK

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In re:

KRIS DANIEL ROGLIERI

Debtor

Chapter 7

Case No. 24-10157

CHRISTIAN H. DRIBUSCH, as the Chapter 7 Trustee
to the Bankruptcy estate of Kris Daniel Roglieri

Adv. Pro. No. 24-90015

Plaintiff,

-against-

KRIS DANIEL ROGLIERI

Defendant.

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**REQUEST FOR ENTRY OF DEFAULT UNDER
FEDERAL RULE OF BANKRUPTCY PROCEDURE RULE 7055(B)**

Christian H. Dribusch, counsel for the plaintiff, hereby affirms under penalties of perjury,
as follows:

1. A default judgment denying discharge is sought against the defendant Kris Daniel Roglieri.
2. Plaintiff filed an adversary complaint in the above-captioned proceeding on August 15, 2024 (ECF docket #1).
3. Summons was issued on August 15, 2024 (ECF docket #2).

4. A summons and complaint was served on Kris Daniel Roglieri on August 15, 2024.
5. A certificate of service evidencing service was filed with the Bankruptcy Clerk on August 15, 2024 (ECF docket #4).
6. The service of each summons and complaint has not been returned as undeliverable.
7. Plaintiff believes the defendant has been properly served pursuant to Federal Rule of Bankruptcy Procedure Rule 7004(b)(1) in that the summons and complaint was mailed to the defendant at the defendant's usual places of abode.
8. The time for filing an answer by the defendant, or other responses expired on September 16, 2024 (ECF docket #2).
9. No answer or other response has been filed or served by defendant Kris Daniel Roglieri and the defendant is now in default.
10. Upon information and belief, defendant Kris Daniel Roglieri is not an infant or an incompetent person.
11. Upon information and belief, defendant Kris Daniel Roglieri, is not in the military service to be entitled to the benefits of the Soldiers' and Sailors' Civil Relief Act of 1940 (50 U.S.C. Appen. §501, *et seq.*).
12. The complaint alleges several grounds to deny the Defendant a discharge in bankruptcy under 11 U.S.C. §727.
13. This adversary proceeding is a core proceeding under 28 U.S.C. §157(b)(2)(J).

WHEREFORE, the plaintiff requests that the Court enter default against the defendant, Kris Daniel Roglieri.

Dated: September 23, 2024

By: /s/ Christian H. Dribusch
Christian H. Dribusch